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9 Attorneys for Plaintiff SAUL CHIRE

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 SAUL CHIRE,

13 Plaintiff,

14 v.

15 NEW CASTLE CORP., d.b.a. EXCALIBUR
16 HOTEL & CASINO;

17 Defendant.

Case No. 2:14-cv-00383 -RFB -NJK

**STIPULATION FOR PROTECTIVE
ORDER**

18 The parties to this action, Defendants NEW CASTLE CORP., d.b.a. EXCALIBUR
19 HOTEL & CASINO and Plaintiff SAUL CHIRE, by their respective counsel, hereby stipulate and
20 request that the Court enter a protective order pursuant to Fed. R. Civ. P. 26 as follows:

21 WHEREAS, Defendants have sought information concerning the personal income of a
22 witness, not a party to this action, Pastor Eliezer Benavides, and further have sought information
23 pertaining to any interest of the Church State Council with respect to these proceedings, and

24 WHEREAS counsel for Plaintiff has agreed to provide this information to Defendants by
25 means of a sworn declaration executed by Pastor Benavides, and that such information shall be
26 disclosed and designated as "Confidential Information."

1. The Protective Order shall be entered pursuant to the Federal Rules of Civil Procedure and FRE 502 (d) and (e).

3. Except as required by law, Confidential Information shall be held in confidence by each qualified recipient to whom it is disclosed, shall be used only for purposes of this action, shall not be used for any business purpose, and shall not be disclosed to any person who is not a qualified recipient. All produced Confidential Information shall be carefully maintained so as to preclude access by persons who are not qualified recipients.

(a) In-house counsel and law firms for each party and the secretarial, clerical and paralegal staff of each;

(c) Persons other than legal counsel who have been retained or specially employed by a party as an expert witness for purposes of this lawsuit or to perform investigative work or fact research;

5. Each counsel shall be responsible for providing notice of the Protective Order and the terms therein to persons to whom they disclose "Confidential Information," as defined by the terms of the Protective Order.

6. Persons to whom Confidential Information is shown shall be informed of the terms of this Order and advised that its breach may be punished or sanctioned as contempt of the Court. Such deponents may be shown Confidential Information during their deposition but shall not be permitted to keep copies of said Confidential Information nor any portion of the deposition transcript reflecting the Confidential Information.

7. No copies of Confidential Information shall be made except by or on behalf of attorneys of record, in-house counsel or the parties in this action. Any person making copies of such information shall maintain all copies within their possession or the possession of those entitled to access to such information under the Protective Order.

8. The termination of this action shall not relieve the parties and persons obligated hereunder from their responsibility to maintain the confidentiality of information designated Confidential pursuant to this Order.

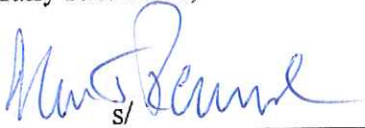
9. Upon termination of this action by entry of a final judgment (inclusive of any appeals or petitions for review), counsel for Defendant agrees to return or destroy the previously furnished Confidential Information, i.e., the Declaration of Pastor Eliezer Benavides, including any copies thereof, and will be obligated to return or destroy it within thirty (30) days of a request.

10. Defendant reserves the right to use the information at trial and/or settlement conference(s); Plaintiff reserves the right to object to the use of the information at trial.

1 11. Once executed by all parties, the Stipulation shall be by treated by the Parties as an
2 Order of the Court until it is formally approved by the Court.

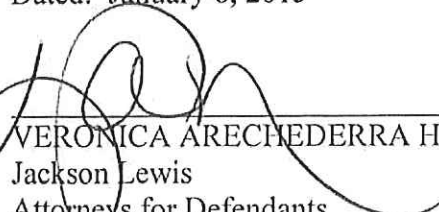
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4 Dated: January 6, 2015

5 Respectfully submitted,

6 
7 s/

8 CHRISTIAN GABROY, ESQ.
9 GABROY LAW OFFICES
10 Alan J. Reinach, Esq.
Church State Council
Attorneys for Plaintiff Saul Chire

11 Dated: January 6, 2015

12 
13 VERONICA ARECHEDERRA HALL, ESQ.
14 Jackson Lewis
Attorneys for Defendants

16 IT IS SO ORDERED

17
18 Dated this 7th day of January, 2015.

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23 NANCY J. KOPPE
24 United States Magistrate Judge